

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: AMOREENA D KOKENES	)	Case No. 23 B 01294
	)	
	)	Chapter 13
Debtor(s)	)	
	)	Judge: TIMOTHY A BARNES

**NOTICE OF MOTION & CERTIFICATE OF SERVICE**

AMOREENA D KOKENES  
250 VICTORIA LN  
ELK GROVE VILLAGE, IL 60007

SUBURBAN LEGAL GROUP PC  
via Clerk's ECF noticing procedures

PLEASE TAKE NOTICE that on January 16, 2025 at 9:15 am., I will appear before the Honorable Judge TIMOTHY A BARNES or any judge sitting in the judge's place, **either** in Courtroom 744, Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the motion of trustee to dismiss for failure to make plan payments, a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com>. Then enter the meeting ID and passcode.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 329 5276 and the passcode is 433658. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I, Besira Nikolla a non-attorney, declare under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown by U.S. mail or by the methods indicated on December 23, 2024.

Thomas H. Hooper  
Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Besira Nikolla

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**MOTION TO DISMISS FOR FAILURE TO MAKE PLAN PAYMENTS**

Now comes Thomas H. Hooper, Trustee and requests that this case be dismissed pursuant to 11 U.S.C. §1307(c)(6), and in support thereof respectfully states the following:

On January 31, 2023 the debtor(s) filed a petition under Chapter 13 of the Bankruptcy Code which was confirmed by the Court on September 14, 2023 for a term of 60 months with payments of \$2,100.00.

The status of the debtor's plan is:

<u>Current Month</u>	<u>Cash Due</u>	<u>Cash Received</u>	<u>Payment Default</u>
19	\$28,800.00	\$22,100.00	\$6,700.00

A summary of the 3 most recent receipt items is set forth below: Report Date: 12/23/2024  
Due Each Month: \$2,100.00  
Next Payment Due: 01/02/2025

<u>Receipt Date</u>	<u>Ref Number</u>	<u>Amount</u>
09/27/2024	9996490000	\$1,200.00
10/14/2024	1002554200	\$1,300.00
11/25/2024	1008544900	\$1,300.00

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this Court deems just and proper.

/s/ Thomas H. Hooper

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Thomas H. Hooper, Trustee

Thomas H. Hooper  
Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900